



August 19, 2008

Mr. Steve Spurlin
Federal On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
Ed Jones Federal Building
109 South Highland Avenue, B-13
Jackson, Tennessee 38301

**Subject: Comprehensive Environmental Response, Compensation, and Liability Act
Removal Assessment Letter Report
Clinton Smelter / Magnet Mills Site
Clinton, Anderson County, Tennessee
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-003-0041**

Dear Mr. Spurlin:

The Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting the removal assessment letter report for the Clinton Smelter / Magnet Mills Site in Clinton, Anderson County, Tennessee (Appendix A, Figures 1 and 2). This letter report summarizes field activities conducted at the site on May 1, 2008.

This letter report has been prepared under Technical Direction Document (TDD) No. TTEMI-05-003-0044, which the U.S. Environmental Protection Agency (EPA) Region 4 assigned to Tetra Tech START under Contract No. EP-W-05-054. The overall scope of this TDD, monitored by EPA Federal On-Scene Coordinator (OSC) Mr. Steve Spurlin of the Emergency Response and Removal Branch (ERRB), was to provide responders, equipment, supplies, and services necessary to conduct a removal assessment at a former smelter and textile mill in Clinton, Anderson County, Tennessee. Specific elements of this TDD include:

- ◆ Document site activities using logbooks (see Appendix B) and photographs (see Appendix C)
- ◆ Collect multimedia samples necessary to characterize site conditions
- ◆ Procure a laboratory for sample analysis
- ◆ Conduct field hazard categorization, as necessary, to characterize suspect hazardous materials
- ◆ Track costs and report to EPA via Removal Cost Management System Form 1900-55
- ◆ Produce this Removal Assessment Letter Report

This Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal assessment letter report discusses the site background, site activities and sampling, and conclusions. Appendix D contains a list of witnesses and contacts associated with the site; a list of materials discovered at the facility is included as Appendix E; and a copy of the Cursory Data Validation Report prepared by Tetra Tech, including the results of sample analysis, is included as Appendix F.

SITE BACKGROUND

The site is located at 101 Collum Street in Clinton, Anderson County, Tennessee (see Appendix A, Figure 1). Zinc smelting operations ceased at the site prior to 1906, and the exact location of the former smelter is unknown. Magnet Knitting Mills of Clinton, Tennessee, began operation at the site in 1906 and was incorporated in 1929 as Magnet Mills, Inc., a locally owned and operated hosiery mill. The mill closed in March 1967. Approximately six warehouse-type buildings occupy the site (see Appendix A, Figure 2). Many of the warehouses are in disrepair and some are partially collapsed.

Site background information was obtained from Mr. Burl Maupin of the Tennessee Department of Environment and Conservation (TDEC). TDEC officials visited the site and observed suspected unsecured hazardous materials, including drums of polychlorinated biphenyl (PCB) oil, pesticides, and solvents; asbestos-containing materials, and lead-acid batteries. TDEC officials also collected X-ray fluorescence readings from several soil samples collected at the site. Mr. Maupin contacted OSC Spurlin and requested that EPA ERRB conduct a removal assessment. Trip reports, including photographs, from TDEC site visits on April 3 and 7, 2008, are included as Attachment 1.

The current owner of the site is Clinch River Properties, L.L.C. (CRP), which is owned by Mr. Yuh-Ching (Eugene) Huang and Mr. David Comer. A portion of the southern end of the property was sold to CVS Pharmacy. Mr. Comer operates a business at the facility that buys and sells materials and equipment and supplies from other businesses. Typically, the seller is going out of business, and Mr. Comer purchases the materials at auction or in lots from eBay or similar clearinghouses. Items purchased in lots often include chemicals, some of which are hazardous, along with other merchandise.

SITE ACTIVITIES AND SAMPLING

May 1, 2008

OSC Spurlin, supported by Mr. Chris Draper and Mr. Jody Sumner of Tetra Tech START, arrived at the site at 1200 hours and met with Mr. Maupin. Mr. Comer and Mr. Huang conducted a tour of the facility, including the locations of chemicals and suspected hazardous materials, and described current operations. Appendix E contains an inventory of the materials discovered at the facility.

Throughout the tour, OSC Spurlin identified the containers and soils to be sampled, as well as the analytical suite (see Table 1). As indicated in Appendix E, the location and types of materials discovered varied. Many of the chemicals, primarily those discovered in the boiler room (see Appendix A, Figure 2), had, according to Mr. Comer, been abandoned by the previous owner; however, others had been purchased by Mr. Comer and were stored in the North Warehouse.

Suspected PCB transformers had been removed from service on Transformer Pads Numbers 1, 2, and 3 (see Appendix A, Figure 2). The oils had been drained by employees of CRP and collected in drums. Additionally, CRP personnel had excavated soils from the area adjacent to Transformer Pads 1 and 2. Excavated soils were placed into large boxes and stored at the facility pending characterization.

OSC Spurlin determined that three samples — two grabs and one composite — would be collected from drums containing transformer oil and analyzed for PCBs; two samples would be collected from suspected drums of flammable liquids for flash point analysis; and a soil sample would be collected from the areas adjacent to Transformer Pads 1 and 2 to ensure that no PCBs remained.

All EPA, TDEC, and Tetra Tech START personnel demobilized from the site at 1900 hours.

TABLE 1
SAMPLE COLLECTION AND DATA SUMMARY

Sample ID	Type	Matrix	Analyses	Location Description	Result
CSMM-GD-01	Grab	Oil	PCBs	55-gallon drum marked "T-oil" located outside of the lean-to west of water tower that had, according to Mr. Comer, most likely been drained from Transformer Pad 1	37.1 mg/kg (Arochlor 1260)
CSMM-GD-02	Grab	Oil	PCBs	55-gallon drum marked "Transformer Oil e Back" located in the boiler room	16.3 mg/kg (Arochlor 1260)
CSMM-GD-03	Grab	Liquid	Flash Point	55-gallon drum labeled as <i>ECOLAB Sani Glide</i> , but marked "methanol" in the boiler room	100° Fahrenheit
CSMM-GD-04	Grab	Liquid	Flash Point	55-gallon drum labeled as <i>American Industrial Corporation Isopropanol</i> in the boiler room	80° Fahrenheit
CSMM-CD-01	Composite	Oil	PCBs	Three of the twelve 55-gallon drums marked "T-oil" located outside of the lean-to east of water tower. Oil that had been drained from transformers removed from Transformer Pads 1, 2, & 3	2.2 mg/kg (Arochlor 1260)
CSMM-CS-01	Composite	Soil	PCBs	Soil adjacent to Transformer Pad 1	0.47 mg/kg (Arochlor 1260)
CSMM-CS-02	Composite	Soil	PCBs	Soil adjacent to Transformer Pad 2	1.37 mg/kg (Arochlor 1260)

Notes:

CSMM = Clinton Smelter / Magnet Mills
CD = composite from drums
CS = composite soil
GD = grab from drum
mg/kg = milligrams per kilogram

CONCLUSION

Sample results indicated that the two drums suspected of containing flammable liquids exhibited the characteristic of ignitability. None of the PCB samples indicated concentrations greater the 50 parts per million as necessary for regulation in accordance with Title 40, Code of Federal Regulation, Part 761, *Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*. Based on the site conditions and the sampling results, OSC Spurlin concluded that an emergency removal action was not warranted. However, Mr. Comer was advised to procure the services of a hazardous waste disposal contractor, dispose of all hazardous wastes, and to sell any lots of hazardous materials to avoid the possibility of speculative accumulation.

If you have any questions or need additional copies of this removal assessment letter report, please call me (Chris Draper) at (615) 969-1334 or Andrew Johnson at (678) 775-3100.

Sincerely,



Chris Draper
START III Site Manager



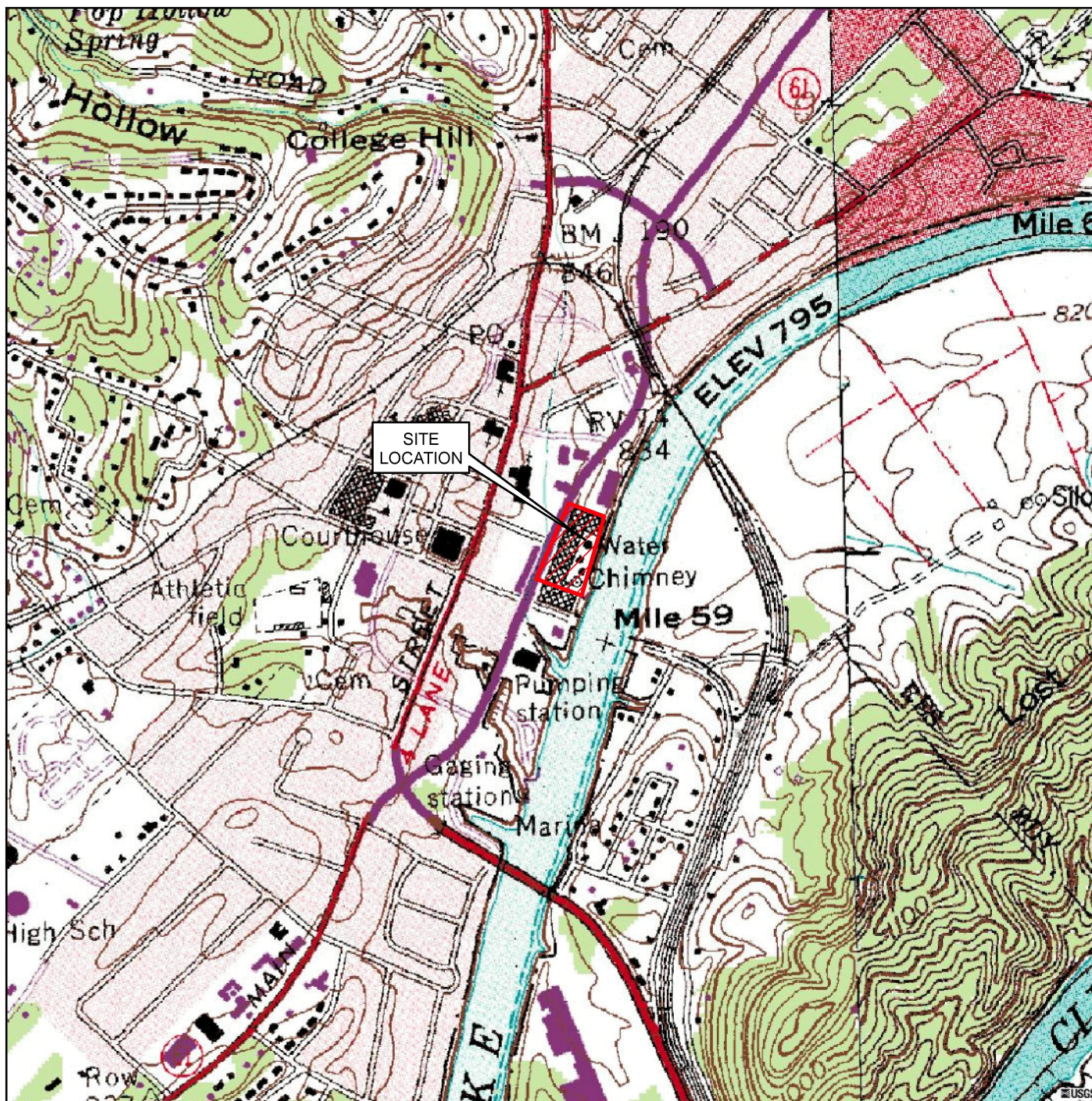
Andrew F. Johnson
START III Program Manager

Enclosure

cc: Katrina Jones, EPA Project Officer
Darryl Walker, EPA Alternate Project Officer
Angel Reed, START Document Control Coordinator

APPENDIX A

FIGURES (Two Pages)



0 500 1,000
Feet
1:12,000

MAP SOURCE: USGS;
CLINTON, TENNESSEE QUADRANGLE, 1975
& POWELL, TENNESSEE QUADRANGLE, 1976

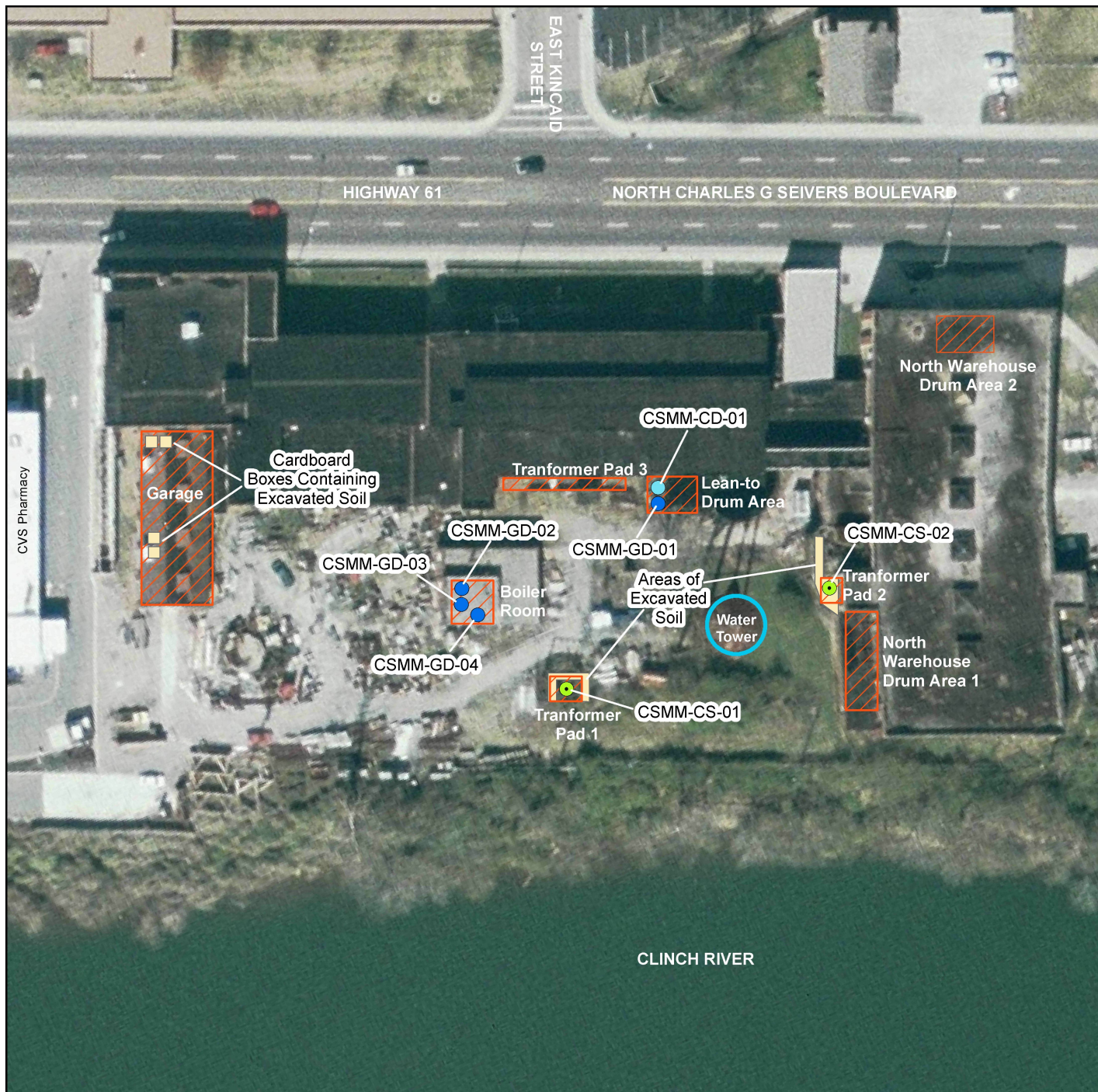


United States Environmental Protection Agency

CLINTON SMELTER/MAGNET MILLS SITE
CLINTON,
ANDERSON COUNTY,
TENNESSEE
TDD: TTEMI-05-003-0044

**FIGURE 1
SITE LOCATION**





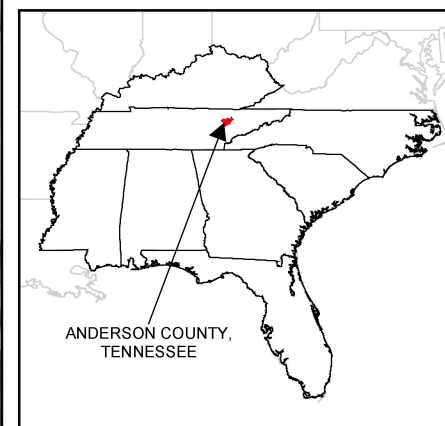
LEGEND

- COMPOSITE DRUM SAMPLING LOCATION
- GRAB DRUM SAMPLING LOCATIONS
- COMPOSITE SURFACE SOIL SAMPLING LOCATIONS
- AREAS OF INTEREST



0 25 50 75 100 Feet
1:963

SOURCE: USGS; KNOXVILLE, TN
HIGH-RES URBAN ORTHO-IMAGERY, 2002.



United States Environmental Protection Agency

CLINTON SMELTER/MAGNET MILLS SITE
CLINTON,
ANDERSON COUNTY,
TENNESSEE
TDD: TTEMI-05-003-0044

**FIGURE 2
SITE LAYOUT AND
SAMPLING LOCATIONS**



APPENDIX B

LOGBOOK NOTES (Nine Pages)

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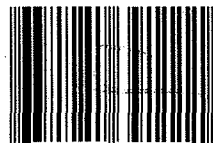
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No. 391

CLINTON SMELTER / MAGNET MILLS

TIENTI-05-003-0048 P
0044



Project TEMI-05-003-0045 ⁰⁰⁴⁴ *J*

0044

0045

START = CHRIS DRAFER, SM
JODY SUMNER, FTM

5/1/08

11:45 EDT - START DRAPER : SUMNER ARRIVE
MEET Mr. COMER : HUANG, OWNERS (CRP)
STATES CITY MGR., STEVE JONES MAY
HAVE CALLED STATES
BOUGHT GREENBRIER AFTER CLOSURE
IN 1993

1202 BURL MAUPIN, TDEC ARRIVES

1203 OSC SPURLIN ARRIVES

1212 BEGIN TOUR

1218 BLD. W/ DRUMS

METAL POWDER (F/S?)

1 MEK

METHANOL

TRANS FORMER OIL

WINDSHIELD WASHER

ETHANOL

IPA

HYPOCHLORITE SOLN

NEED KILLER

DI WATER

SOAP / SURFACTANT

HYDRAULIC OIL

1231 VIEW TRANSFORMER PAD W/ NO TRANSFORM
SOME STAINING AND DARK SOIL
TRANSFORMERS REMOVED EARLIER THIS
WEEK

12 EA. 55-GAL DRUMS OF OIL
DRAINED FROM TRANSFORMERS

1241 SMALL BLD NEAR TRANS OIL
HAS 6 DRUMS, MOST EMPTY, FEW
FOGUE.

1246 ANOTHER TRANS PAD. W/ NO TRANS
SOIL EXCAVATED AND STORED IN
ROLL-OFFS

1247 ROOM BEHIND SECOND TRANS PAD
STORES DRUMS OF WATER TREATMENT,

WATER TREATMENT, WRIGHT (4)

MOBIL LUBRICANT OIL (4)

GREASE (4)

GRAPHITE (4)

5 EA 50 lb BAGS OF QUENCH SALT

— OXIDIZER (NITRATES : TRITES)

1253 ROOM BEHIND IS LARGE WAREHOUSE
FULL OF ITEMS COLLECTED OR
PURCHASED IN LOT 6

1303 UPSTAIRS WAREHOUSE HAS DRUMS

13 RAIL CURVE LUBRICATE

2 STYROL W/ STIRENE

2 CROSYLIC ACID

MAA

19 DRUMS AND 9 EMPTY

BOX FULL OF AT LEAST 12
CYLINDERS OF PROPANE

1309 OSC SPURLIN DISCUSSES OPTIONS
W/ MR. COMER

THERE ARE HAZ. SUBSTANCES
NEED TO CHARACTERIZE MATERIALS
AND GET RID OF IT.

EPA MAY TAKE A FEW SAMPLES

MR. MAUPEN, TDEC, SAYS MAY ALSO BE
A RCRA ISSUE. B/C MR. COMER
IS OPERATING A BUSINESS HERE

1346 VIEW BOXS OF SOIL

2 ~ 4 ft³ BOXES OF SOIL FROM
E. BACK (T-PAD NO. 2)

2 ~ 3 ft³ BOX SOIL FROM T-PAD
NO. 1

1350 STEVE PAYNG, ANDERSON CO. EMA
ON SITE. TOUR CONCLUDES

1430 START TASKED TO GET INVENTORIES
BY LOCATION AND SAMPLE

SAMPLES

BOILER ROOM

1 EA 55-GAL LABELED TRANSFORMER OIL
2L, 208. ← 1 EA 55-GAL MARKED METHANOL
3 10A

~~WEST~~
LEG TOO EAST OF WATER TOWER

1 EA 55-GAL MARKED T-OIL FROM
TRANSFORMER PAD 1

1 EA COMPOSITE OF FET T-OIL DRUMS (3)
FROM PADS 1, 2, 3

SOILS

1 EA COMPOSITE FROM SOIL @ PAD 1

1 EA COMPOSITE FROM SOIL @ PAD 2

RP

1500 Mr. Comer gives EPA permission to sample

1524 Collect CSMM-GD-01 from PC⁷ drum marked T-OIL supposedly from PAD 1

1531 Collect CSMM-CD-01 from 3 drum marked T-OIL from various pads

1601 CSMM-GD-02 from drum marked TRANSFORMER OIL NO GOOD FROM E. BACK

1610 Collect CSMM-GD-03 from drum marked METHANOL AND CSMM-GD-04 MARKED IPA
START SUMMER TO COLLECT COMPOSITE SOIL SAMPLES FROM TRANSFORMER PAD 1 (CSMM-CS-01) AND T-PAD 2 (CSMM-CS-02)

INVENTORY BY LOCATION

N. WAREHOUSE, FIRST FLOOR

6 EA 55 VERSA TL - SULFONATED POLYSTYRENE
CAS: 9016-91-5

2 EA 55 PENRECO - SNOW WHITE PET USP

3 EA 55 WRIGHT CHEM. CORP

WATER TREATMENT COMPOUND LIQUID (WTCL)

1 EA 55 ZIMMITE CORP - YELLOW DRUM
W/WTCL

4 EA MOBIL - SHC 634

9 EA CONOCO - DETCOL R:O OIL 460

1 EA GREEN 30 GAL N/UNK ORG LIQ

4 EA 55 GREASE

5 EA 50 lb BAG - PARK METALURGY
AUS HEAT BATH QUENCH SALT

1 ea 30 GAL - Home Care Prod - LAUNDRY DET

1 ea SS - WURCO ADHESIVE

1 ea SS PARK CHEM CORP -
AAA QUENCH OIL

1 ea SS KUTWELL 40

4 ea SS GRAPHITE DUST.

3 ea 50 lb BAG VERSA TL
29-7070 AAS 1950

3 ea 5 Rotor Room : HAAS
TAMOL 731, 25%

N. WAREHOUSE, SECOND FLOOR

5 ea C/T SS REICHOLD

POLYLITE 32-166-15

W/ 1,3-BENZENE CARBOXYLIC ACID

2 ea O/T SS - COOK COMPOSITS :

POLYMERS - STIPOL 040-4917

W/ STYRENE MONOMER

13 ea SS RAIL CURE LUBRICANT

1 ea SS (BLUE C/T) SILMAR CO.

~~BATCH 3092~~ 5962 BATCH 302555

16 ea SS FIBERS - EASTMAN

S L: SIPA, PARTIALLY DEHYDRATED

S-SULFO-1,3-BENZENE DICARBOXYLIC ACID,

MONOLITHIUM SALT

GARAGE

2 EA SS HYDRAULIC OIL

4 EA ~ 4 ft³ BOXES OF SOIL
FROM PADS 1:2

BOILER ROOM

2 EA SS OF STEEL DUST

1 EA SS C/T BLACK: RED TEXACO

2 EA SS - WATER SERV. INC. DI WATER

1 EA SS - DIVERSY CORP. MASTER KLEEN

1 EA SS - TEXACO - TRANSFORMER OIL

1 EA 30 - BOTCO - SCORCH PLUS

VEG. KILLER 2,4-DIS (ISOPROPYLAMINO)-6
METHOXY-S-TREAZINE

3 EA SS BLUE, POLY PH = 9

2 EA SS BLUE, POLY OIL

1 EA SS - LABELED ECOLAB SANI GLIDE
BUT MARKED "METHANOL" - SAMPLE/FLASH

1 EA SS METAL, BLACK/O/T - FORTAFIL FIBRES
ETHANOL

6 EA SS RED/WHITE - PB: S - METHANOL
SAMPLED/FLASH

1 EA SS - AMERICAN IND CHEM CORP - IPA

1 EA SS BLACK/METAL

1 EA 30 BLUE/POLY - WATER SERV. INC.
SCA -- TROL

2 EA SS ADKLEEN - ETHYLENE
GLYCOL MONOBUTYL ETHER

13 EA 10-GAL ON PALLET - WINDSHIELD
CLEANER

1 EA^{SS} MODULITE 22 GREASE

1 EA 10 GNL - GREASE

1 EA SS LABELED MER, BUT H₂O

1 EA SS BLUE/CIT N/OIL DRI - OIL^{EST.}

1 EA SS BLACK/RUST - NO BUNGS - OIL^{EST.}

1 EA SS BLUE/OT^{MARKED} TRANSFORMER OIL
E. BACK

1 EA SS WHT/POLY - MARKED
TRANSFORMER OIL E. BACK

1 EA SS ECOLAB EXT~~ER~~ G&G LERATE
CIP SODIUM HYD, SOD HYPOCHLOR

1 EA SS ECOLAB MATRIX

1 EA SS WT/POLY MARKED HYDRO OIL

1 EA SS WT/POLY MARKED SOAP

1 EA SS BLUE/BENT TOP - WATER

1 EA 30 - BLUE/POLY - DETERGENT^{EST.}

1 EA 30 WATER SAVING INC. - COND. TROL

1 EA 30 WATER SAVING INC. - CONDITIONER^{B-6}

1 EA 30 WATER SAVING INC. - POLY PLEX 3008

LENTOO BW of WATER TOWER

12 EA SS POLY OF TRANSFORMER OIL
DRAINED FROM SITE TRANSFORMERS
- 2 SAMPLE

1 EA SS BLUE/CIT - STENCILED
"TRANSFORMER OIL" - LOOKS LIKE H₂O

1800 SAMPLING AND INVENTORY COMPLETE
PREP FOR DEMOBE

1900 START DEMOBES FROM SITE
TO NASHVILLE

Mr. D

5/1/08

APPENDIX C

PHOTOGRAPHIC LOG (17 Pages)



OFFICIAL PHOTOGRAPH NO. 1
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	Southwest	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Rear of site		



OFFICIAL PHOTOGRAPH NO. 2
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0044

Location: Clinton Smelter / Magnet Mills Site

Orientation: North

Date: 1 May 2008

Photographer: Chris Draper, Tetra Tech

Witness: Jody Sumner, Tetra Tech

Subject: Boiler room



OFFICIAL PHOTOGRAPH NO. 3
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0044

Location: Clinton Smelter / Magnet Mills Site

Orientation: Northeast

Date: 1 May 2008

Photographer: Chris Draper, Tetra Tech

Witness: Jody Sumner, Tetra Tech

Subject: Drums in boiler room



OFFICIAL PHOTOGRAPH NO. 4
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0044

Location: Clinton Smelter / Magnet Mills Site

Orientation: West

Date: 1 May 2008

Photographer: Chris Draper, Tetra Tech

Witness: Jody Sumner, Tetra Tech

Subject: Drums in boiler room



OFFICIAL PHOTOGRAPH NO. 5
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	East	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Transformer Pad #1 with visible staining. Soil in foreground was recently excavated.		



OFFICIAL PHOTOGRAPH NO. 6
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	East	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Transformer Pad #1, exhibiting visible staining		



OFFICIAL PHOTOGRAPH NO. 7
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	North	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Drums of oil removed from on-site transformers		



OFFICIAL PHOTOGRAPH NO. 8
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	North	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Drums in lean-to west of water tower. Tetra Tech START personnel observed that material from one leaking drum was allowed to drain into another empty drum.		



OFFICIAL PHOTOGRAPH NO. 9
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	West	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Transformer Pad #2 with visible staining		



OFFICIAL PHOTOGRAPH NO. 10
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	West	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Drums of material that were purchased in lots for resale within the north warehouse		



OFFICIAL PHOTOGRAPH NO. 11
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	East	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Drums of material that were purchased in lots for resale within the north warehouse. The floor in this area was visibly stained.		



OFFICIAL PHOTOGRAPH NO. 12
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	South	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Box containing propane cylinders and fluorescent light tubes stored upstairs in the northern warehouse		



OFFICIAL PHOTOGRAPH NO. 19
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	North	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Drums stored upstairs in northern warehouse		



OFFICIAL PHOTOGRAPH NO. 14
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	North	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Fiber drums stored upstairs within a central warehouse		



OFFICIAL PHOTOGRAPH NO. 15
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-003-0044 **Location:** Clinton Smelter / Magnet Mills Site
Orientation: Northeast **Date:** 1 May 2008
Photographer: Chris Draper, Tetra Tech **Witness:** Jody Sumner, Tetra Tech
Subject: Single fiber drum stored near an area of collapsed ceiling within a central warehouse



OFFICIAL PHOTOGRAPH NO. 16
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	Southwest	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Boxes of soil excavated from Transformer Pads #1 and # 2 awaiting characterization and disposal		



OFFICIAL PHOTOGRAPH NO. 17
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-003-0044	Location:	Clinton Smelter / Magnet Mills Site
Orientation:	Southwest	Date:	1 May 2008
Photographer:	Chris Draper, Tetra Tech	Witness:	Jody Sumner, Tetra Tech
Subject:	Boxes of soil excavated from Transformer Pads #1 and # 2 awaiting characterization and disposal		

APPENDIX D

TABLE OF WITNESSES (One Page)

TABLE OF WITNESSES
CLINTON SMELTER/MAGNET MILLS SITE
CLINTON, ANDERSON COUNTY, TENNESSEE

Mr. Steve Spurlin
Federal On-Scene Coordinator
Emergency Response and Removal Branch
U.S. Environmental Protection Agency, Region 4
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Site Manager
Superfund Technical Assessment and Response Team (START)
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Telephone No.: (304) 633-1109

Mr. Yuh-Ching (Eugene) Huang
Clinch River Properties, L.L.C.
1453 Campbell Station Road
Knoxville, TN 37932
Telephone No.: (304) 633-1109



APPENDIX E

INVENTORY OF MATERIALS DISCOVERED (One Page)

INVENTORY OF MATERIALS DISCOVERED

Material Description	Location	Quantity	Volume or Weight
Adkleen ethylene glycol monobutyl ether	Boiler room	2	55-gallon
American Industrial Corporation Isopropanol	Boiler room	1	55-gallon
Betco Scorch Plus Vegetation Killer	Boiler room	1	30-gallon
Black, metal of suspected oil	Boiler room	1	55-gallon
Blue, metal marked "Transformer Oil e Back"	Boiler room	1	55-gallon
Blue, metal of water	Boiler room	1	30-gallon
Blue, poly of oil	Boiler room	2	55-gallon
Blue, poly of oil-contaminated oil dry	Boiler room	1	55-gallon
Blue, poly of suspected detergent/surfactant	Boiler room	1	55-gallon
Diversey Corporation Master Kleen	Boiler room	1	55-gallon
Drum labeled as ECOLAB Sani Glide marked "methanol"	Boiler room	1	55-gallon
Drum of water labeled methanol	Boiler room	1	55-gallon
ECOLAB Excclerate CIP with sodium hydroxide	Boiler room	1	55-gallon
ECOLAB Matrix	Boiler room	1	55-gallon
Ethanol	Boiler room	1	55-gallon
Grease	Boiler room	1	10-gallon
Mobilite 22 Grease	Boiler room	1	55-gallon
PB&S Methanol	Boiler room	6	55-gallon
Steel dust	Boiler room	2	55-gallon
Texaco Oil	Boiler room	1	55-gallon
Texaco Transformer Oil	Boiler room	1	55-gallon
Unknown black, metal drum	Boiler room	1	55-gallon
Unknown blue, poly drum with pH 9	Boiler room	3	55-gallon
Water Services, Inc. B-6 Conditioner	Boiler room	1	30-gallon
Water Services, Inc. Deionized water	Boiler room	2	55-gallon
Water Services, Inc. Poly Plex	Boiler room	1	30-gallon
Water Services, Inc. Scaletrol	Boiler room	1	30-gallon
Water Services, Inc. Scaletrol	Boiler room	1	30-gallon
White, poly marked "Hydro Oil"	Boiler room	1	55-gallon
White, poly marked "soap"	Boiler room	1	55-gallon
White, poly marked "Transformer Oil e Back"	Boiler room	1	55-gallon
Windshield cleaner	Boiler room	13	10-gallon
Hydraulic oil	Garage	2	55-gallon
Soil excavated from transformer Pad #1 and #2	Garage	4	4 cubic foot box
Blue, metal stenciled "transformer oil"	Lean-to west of water tower	1	55-gallon
Transformer oil drained from site transformers	Lean-to west of water tower	12	55-gallon
Conoco Oil Dectol R&O Oil 460	North warehouse, first floor	9	55-gallon
Graphite dust	North warehouse, first floor	4	55-gallon
Grease	North warehouse, first floor	4	55-gallon
Home Care Products Laundry Detergent	North warehouse, first floor	1	30-gallon
Kutwell 40 cutting oil	North warehouse, first floor	1	55-gallon
Metallurgy Quench Salt	North warehouse, first floor	5	50-pound
Mobil Oil SHC 634	North warehouse, first floor	4	55-gallon
Park Chemical Corporation AAA Quench Oil	North warehouse, first floor	1	55-gallon
Penreco Snow White Petrolatum	North warehouse, first floor	2	55-gallon
Rohm & Haas Tamol 731	North warehouse, first floor	3	5-gallon
Unknown green drum of organic liquid	North warehouse, first floor	1	30-gallon
Versa TL – sulfonated polystyrene	North warehouse, first floor	3	50-pound
Versa TL – sulfonated polystyrene	North warehouse, first floor	6	55-gallon
Wright Chemical Corp. Water Treatment Compound	North warehouse, first floor	3	55-gallon
Wurco Adhesive	North warehouse, first floor	1	55-gallon
Zimmite Corporation Cooling Water Treatment	North warehouse, first floor	1	55-gallon
Cook Composites and Polymers Stypol 040-4917	North warehouse, second floor	2	55-gallon
Eastman 5 LISIPA (5-(Sodiosulfo) Isophthalic Acid)	North warehouse, second floor	16	55-gallon
Rail Curve Lubricant	North warehouse, second floor	13	55-gallon
Reichold Polylyte with 1,3-benzene carboxylic acid	North warehouse, second floor	5	55-gallon
Silmar Corporation Resin, Batch 302555	North warehouse, second floor	1	55-gallon

APPENDIX F

TETRA TECH CURSORY DATA VALIDATION REPORT (Eight Pages)



June 3, 2008

Mr. Steve Spurlin
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW, 11th Floor
Atlanta, GA 30303

Subject: Clinton Smelter/Magnet Mills Site
Technical Direction Document Number (No.) TTEMI-05-003-0044
Contract No. EP-W-05-054 (START III Region 4)
Cursory Data Validation Report
TestAmerica Analytical Testing Corporation Report No. NRE0234
Analytical Parameters: Polychlorinated biphenyls and flashpoint

Laboratory Report No.:	NRE0234
Samples:	CSMM-GD-01, CSMM-GD-02, CSMM-GD-03, CSMM-GD-04, CSMM-CD-01, CSMM-CS-01, and CSMM-CS-02
Field Duplicate Pairs:	None
Field Blanks:	None

Dear Mr. Spurlin:

The Tetra Tech Superfund Technical Assessment and Response Team (START) conducted data validation on the analytical results for three oil samples, two soil samples, and two aqueous samples that were collected at the Clinton Smelter/Magnet Mills Site in Clinton, Tennessee, on May 1, 2008. The samples were analyzed under laboratory report number NRE0234 by TestAmerica Analytical Testing Corporation (TestAmerica) of Nashville, Tennessee. The oil and soil samples were analyzed for polychlorinated biphenyls (PCB) as Aroclors by SW-846 Method 8082 and the aqueous samples were analyzed for flash point by SW-846 Method 1010.

Analytical data were evaluated in general accordance with all applicable data validation guidance documents, including the following: the U.S. Environmental Protection Agency (EPA) Contract Laboratory Program National Functional Guidelines (NFG) for Organic Data Review (EPA October 1999) and the NFG for Inorganic Data Review (EPA October 2004). The analytical methods used by TestAmerica during this project provide guidance on procedures and method acceptance criteria that, in some areas, differ from the NFGs. Where the methods and the NFGs differ, the data validators followed the acceptance criteria in the methods. In addition, if laboratory-derived acceptance criteria were presented in the TestAmerica data package, then these criteria were used to evaluate the data, unless the criteria were considered inadequate.

Data were evaluated based on the following criteria:

- Data Completeness *
- Sample Preservation, Sample Receipt, and Holding Times
- Laboratory Blanks*
- Surrogates
- Laboratory Control Samples (LCS) and Laboratory Control Sample Duplicates (LCSD)*
- Matrix Spike/Matrix Spike Duplicates (MS/MSD)*

- Laboratory Duplicate Samples *
- Dilution and Reported Detection Limits
- Analyte Identification and Quantitation

* All QC criteria were met for this evaluated parameter. Those criteria without an asterisk (*) displayed a deficiency that is described later in this report that may or may not result in qualification of data.

The following efficient and effective data validation approach was used for providing an abbreviated assessment of the quality of the set of data. Data evaluation consisted of a review of the data with a focus on the available review parameters present in the summary data package (which typically does not include the raw data). This review was not a complete assessment of all possible quality control parameters or even of each quality control parameter that was reviewed. The review, rather, was intended to efficiently identify and focus on those problems and quality control deficiencies that could be readily identified from the summary data package. Because of the nature of this approach, some problems and deficiencies may not have been identified; as such, this approach may not support some critical uses and required limits on decision-making uncertainty for the data.

Enclosure 1 presents copies of the sample results sheets from the laboratory data packages, with hand-entered qualifications from the data validation effort. Enclosure 2 presents the same data validation-qualified analytical results in table format.

DATA REVIEW RESULTS

The following sections discuss the data package and provide an overall assessment of the data. This discussion concentrates on the irregularities associated with the various parameters as indicated above.

SAMPLE PERSERVATION, SAMPLE RECEIPT, and HOLDING TIMES

There were no problems with holding times. However, the sample temperature on receipt at the laboratory was 8.2 degrees, above the acceptable range of 2 to 6 degrees. Therefore, the reported flash point temperatures, which are strongly influenced by the volatile organic content of the samples, were qualified as estimated (flagged "J") and may be biased high for samples CSMM-GD-03 and CSMM-GD-04. PCBs are not a major concern because they are extremely stable under environmental conditions, so PCB results were not qualified based on the elevated sample temperature.

SURROGATES

All surrogate recoveries were within the laboratory-established limits except for the second surrogate, decachlorobiphenyl, for samples CSMM-CS-01 and CSMM-CS-02, which yielded high recoveries. Therefore, the detected Aroclor 1260 results for samples CSMM-CS-01 and CSMM-CS-02 were qualified as estimated (flagged "J") and may be biased high.

DILUTION and REQUIRED REPORTING LIMITS

Required reporting limits were met. However, the PCB extract for sample CSMM-GD-01 was diluted 5-fold and the PCB extract for sample CSMM-CS-02 was diluted 10-fold to minimize interference from target and other organic compounds. No qualifications were made for these dilutions.

ANALYTE IDENTIFICATION AND QUANTITATION

In the PCB analysis for sample CSMM-CS-02, the quantitative results for Aroclor 1260 from the two chromatographic columns were considerably different, apparently because the weathered field sample

Mr. S. Spurlin
June 3, 2008

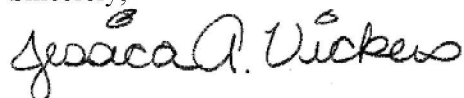
was a poor match to the analytical standard. Therefore, the result for Aroclor 1260 was qualified as estimated (flagged "J") for sample CSMM-CS-02.

OVERALL ASSESSMENT OF DATA

The overall quality of this data package was good. No results were rejected. Results for flash point in samples CSMM-GD-03 and CSMM-GD-04 were qualified as estimated because of inadequate preservation and possible loss of volatiles during shipping. Detected Aroclor 1260 results for samples CSMM-CS-01 and CSMM-CS-02 were qualified as estimated because of high surrogate recoveries. The Aroclor 1260 result for sample CSMM-CS-02 was qualified as estimated because quantitative results between the two columns were considerably different.

Please call me at (678) 775-3104 if you have any questions regarding this data validation report.

Sincerely,



Jessica Vickers
START III Quality Assurance Manager

Enclosures (2)

cc: Katrina Jones, EPA Project Officer
Darryl Walker, EPA Alternate Project Officer
Angel Reed, Tetra Tech START III Document Control Coordinator

ENCLOSURE 1

**FIXED LABORATORY ANALYTICAL RESULTS SHEETS WITH HAND-ENTERED DATA
VALIDATION QUALIFIERS FOR TESTAMERICA ANALYTICAL TESTING
CORPORATION WORK ORDER NO. NRE0234**

(Two Pages)

Client Tetra Tech EMI (7610)
712 Melrose Avenue
Nashville, TN 37211
Attn Chris Draper

Work Order: NRE0234
Project Name: Tetra Tech (TN)
Project Number: Clinton Smelter/Magnet Mills Site
Received: 05/02/08 14:15

ANALYTICAL REPORT

Analyte	Result	Flag	Units	MDL	MRL	Dilution Factor	Analysis Date/Time	Method	Batch
Sample ID: NRE0234-01 (CSMM-GD-01 - Oil) Sampled: 05/01/08 15:24									
Polychlorinated Biphenyls in Oil by EPA Method 8082									
PCB-1016	ND		mg/kg	0.0456	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1221	ND		mg/kg	0.131	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1232	ND		mg/kg	0.0728	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1242	ND		mg/kg	0.0777	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1248	ND		mg/kg	0.141	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1254	ND		mg/kg	0.0825	0.162	5	05/05/08 15:36	SW846 8082	8050296
PCB-1260	37.1		mg/kg	0.131	0.162	5	05/05/08 15:36	SW846 8082	8050296
Surr: Tetrachloro-meta-xylene (15-150%)	50 %					5	05/05/08 15:36	SW846 8082	8050296
Surr: Decachlorobiphenyl (10-146%)	100 %					5	05/05/08 15:36	SW846 8082	8050296
Sample ID: NRE0234-02 (CSMM-GD-02 - Oil) Sampled: 05/01/08 16:08									
Polychlorinated Biphenyls in Oil by EPA Method 8082									
PCB-1016	ND		mg/kg	0.00904	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1221	ND		mg/kg	0.0260	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1232	ND		mg/kg	0.0144	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1242	ND		mg/kg	0.0154	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1248	ND		mg/kg	0.0279	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1254	ND		mg/kg	0.0163	0.0320	1	05/05/08 14:35	SW846 8082	8050296
PCB-1260	16.3		mg/kg	0.0260	0.0320	1	05/05/08 14:35	SW846 8082	8050296
Surr: Tetrachloro-meta-xylene (15-150%)	82 %					1	05/05/08 14:35	SW846 8082	8050296
Surr: Decachlorobiphenyl (10-146%)	84 %					1	05/05/08 14:35	SW846 8082	8050296
Sample ID: NRE0234-03 (CSMM-GD-03 - Water) Sampled: 05/01/08 16:10									
General Chemistry Parameters									
Flashpoint	100	J	Deg F	NA	NA	1	05/05/08 08:55	SW846 1010	8050483
Sample ID: NRE0234-04 (CSMM-GD-04 - Water) Sampled: 05/01/08 16:20									
General Chemistry Parameters									
Flashpoint	80.0	J	Deg F	NA	NA	1	05/05/08 08:55	SW846 1010	8050483
Sample ID: NRE0234-05 (CSMM-CD-01 - Oil) Sampled: 05/01/08 15:31									
Polychlorinated Biphenyls in Oil by EPA Method 8082									
PCB-1016	ND		mg/kg	0.00913	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1221	ND		mg/kg	0.0262	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1232	ND		mg/kg	0.0146	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1242	ND		mg/kg	0.0155	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1248	ND		mg/kg	0.0282	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1254	ND		mg/kg	0.0165	0.0323	1	05/05/08 14:55	SW846 8082	8050296
PCB-1260	2.20		mg/kg	0.0262	0.0323	1	05/05/08 14:55	SW846 8082	8050296
Surr: Tetrachloro-meta-xylene (15-150%)	84 %					1	05/05/08 14:55	SW846 8082	8050296
Surr: Decachlorobiphenyl (10-146%)	86 %					1	05/05/08 14:55	SW846 8082	8050296

HVE
19 May 08

Client Tetra Tech EMI (7610)
712 Melrose Avenue
Nashville, TN 37211
Attn Chris Draper

Work Order: NRE0234
Project Name: Tetra Tech (TN)
Project Number: Clinton Smelter/Magnet Mills Site
Received: 05/02/08 14:15

ANALYTICAL REPORT

Analyte	Result	Flag	Units	MDL	MRL	Dilution Factor	Analysis Date/Time	Method	Batch
Sample ID: NRE0234-06 (CSMM-CS-01 - Soil) Sampled: 05/01/08 16:20									
Polychlorinated Biphenyls by EPA Method 8082									
PCB-1016	ND		mg/kg	0.00940	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1221	ND		mg/kg	0.0270	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1232	ND		mg/kg	0.0150	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1242	ND		mg/kg	0.0160	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1248	ND		mg/kg	0.0290	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1254	ND		mg/kg	0.0170	0.0333	1	05/05/08 11:52	SW846 8082	8050295
PCB-1260	0.470	J	mg/kg	0.0270	0.0333	1	05/05/08 11:52	SW846 8082	8050295
Surr: Tetrachloro-meta-xylene (15-150%)	80 %					1	05/05/08 11:52	SW846 8082	8050295
Surr: Decachlorobiphenyl (10-150%)	168 %	ZX				1	05/05/08 11:52	SW846 8082	8050295
Sample ID: NRE0234-07 (CSMM-CS-02 - Soil) Sampled: 05/01/08 16:40									
Polychlorinated Biphenyls by EPA Method 8082									
PCB-1016	ND		mg/kg	0.0940	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1221	ND		mg/kg	0.270	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1232	ND		mg/kg	0.150	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1242	ND		mg/kg	0.160	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1248	ND		mg/kg	0.290	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1254	ND		mg/kg	0.170	0.333	10	05/05/08 12:53	SW846 8082	8050295
PCB-1260	1.37	J R10	mg/kg	0.270	0.333	10	05/05/08 12:53	SW846 8082	8050295
Surr: Tetrachloro-meta-xylene (15-150%)	20 %					10	05/05/08 12:53	SW846 8082	8050295
Surr: Decachlorobiphenyl (10-150%)	340 %	ZX				10	05/05/08 12:53	SW846 8082	8050295

HJE
19 June 08

ENCLOSURE 2

**DATA VALIDATION-QUALIFIED FIXED LABORATORY ANALYTICAL RESULTS
FOR TESTAMERICA ANALYTICAL TESTING CORPORATION
WORK ORDER NO. NRE0234**

(One Page)

**DATA VALIDATION-QUALIFIED FIXED LABORATORY ANALYTICAL RESULTS
FOR TESTAMERICA ANALYTICAL TESTING CORPORATION, INC. REPORT NO. NRE0234**

Sample Designation:	CSMM-GD-01	CSMM-GD-02	CSMM-GD-03	CSMM-GD-04	CSMM-CD-01	CSMM-CS-01	CSMM-CS-02
Sample Collection Date:	5/1/2008	5/1/2008	5/1/2008	5/1/2008	5/1/2008	5/1/2008	5/1/2008
Polychlorinated Biphenyl Compounds (mg/kg)							
Aroclor-1016	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1221	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1232	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1242	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1248	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1254	0.162 U	0.0320 U	NA	NA	0.0323 U	0.0333 U	0.333 U
Aroclor-1260	37.1	16.3	NA	NA	2.20	0.470 J	1.37 J
Flashpoint (degrees Fahrenheit)							
Flashpoint	NA	NA	100 J	80.0 J	NA	NA	NA

Notes:

mg/kg = Milligrams per kilogram

J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

U = The analyte was analyzed for, but was not detected at or above the associated value.

UJ = The analyte was analyzed for, but was not detected at or above the associated value, which is considered approximate due to deficiencies in one or more quality control criteria.

NA = The sample was not analyzed for this analyte.

ATTACHMENT 1

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TRIP REPORTS FROM APRIL 3 AND 7, 2008
(24 Sheets)**

TDEC DIVISION OF REMEDIATION,
KNOXVILLE
CLINTON SMELTER / MAGNET MILLS
CLINTON, ANDERSON COUNTY, TENNESSEE 37716

TRIP REPORT

DATE OF VISIT: April 3, 2008

OWNER/FACILITY: Clinch River Properties / smelter used by the Eades, Mixer, and Heald Zinc Company, and the Magnet Knitting Mill

DOR SITE Number: 01-500

TYPE FACILITIES: inactive lead/zinc ore smelting
hosiery mill 1906-1967, unknown 1967-present

ADDRESS: Cullom Street, Clinton Quadrangle (137-SW)

PURPOSE OF VISIT: Limited, initial investigation of potential contamination from past manufacturing, spills, storage piles

WEATHER CONDITIONS: rain

SAMPLES COLLECTED: surface soil PHOTOS TAKEN: no

COMMENTS: Ore from a mill near Lead Mine Bend, Union County, was smelted in Clinton. The ruins of an old zinc smelter are shown on the 1910 Sanborn map.

Magnet Mills, Inc. of Clinton, Tennessee, opened its doors in 1906 as Magnet Knitting Mills. In 1929, the Mill was incorporated as Magnet Mills, Inc., a locally owned and operated hosiery mill. In March 1967, the mill was closed down permanently.

The exact location of contamination from the inactive zinc smelter operations is unknown, at this time. A location believed to be near the old smelter site was viewed from the existing railroad at the northern boundary of Parcel 28, map 074J. Mounds of dirt appeared to cover the level portion of the area east of the elevated Charles G. Seivers Boulevard, which may cover some spill areas, storage areas, and contamination due to the smelter operations. Nearer the river, a very steep slope could not be inspected. An eroded spot appeared to show a dark substance, which was indicated to contain 500 ppm lead and 40 ppm arsenic (XRF analysis of sample prepared in KFO lab).

The southern end of this parcel, only one block from the Anderson County Courthouse, was observed from a roadway entering the property at the CVS Pharmacy. This portion of the property contains the inactive Magnet Mills, Inc. Industrial equipment was observed to be scattered about the ground. Unempty drums and containers with unknown contents, batteries, tanks, electric and gasoline motors, fluorescent tubes, cars, and unknown materials were observed outside the several industrial buildings. Six warehouse-type buildings built from 1905-

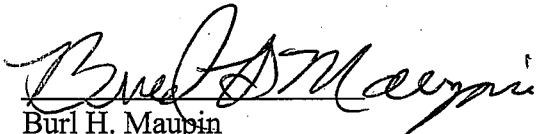
TDEC DIVISION OF REMEDIATION,
KNOXVILLE
CLINTON SMELTER / MAGNET MILLS
CLINTON, ANDERSON COUNTY, TENNESSEE 37716

TRIP REPORT

1926 are at the site. Base area of all the buildings on the property covered approximately 85,000 square feet. Most of these buildings had multiple floors. At least one building was partially collapsed. The interiors of the buildings were not inspected.

One building, at the central portion of the property, appeared to be in use by a trucking business.

Further investigation is recommended.


Burl H. Maupin
April 4, 2008

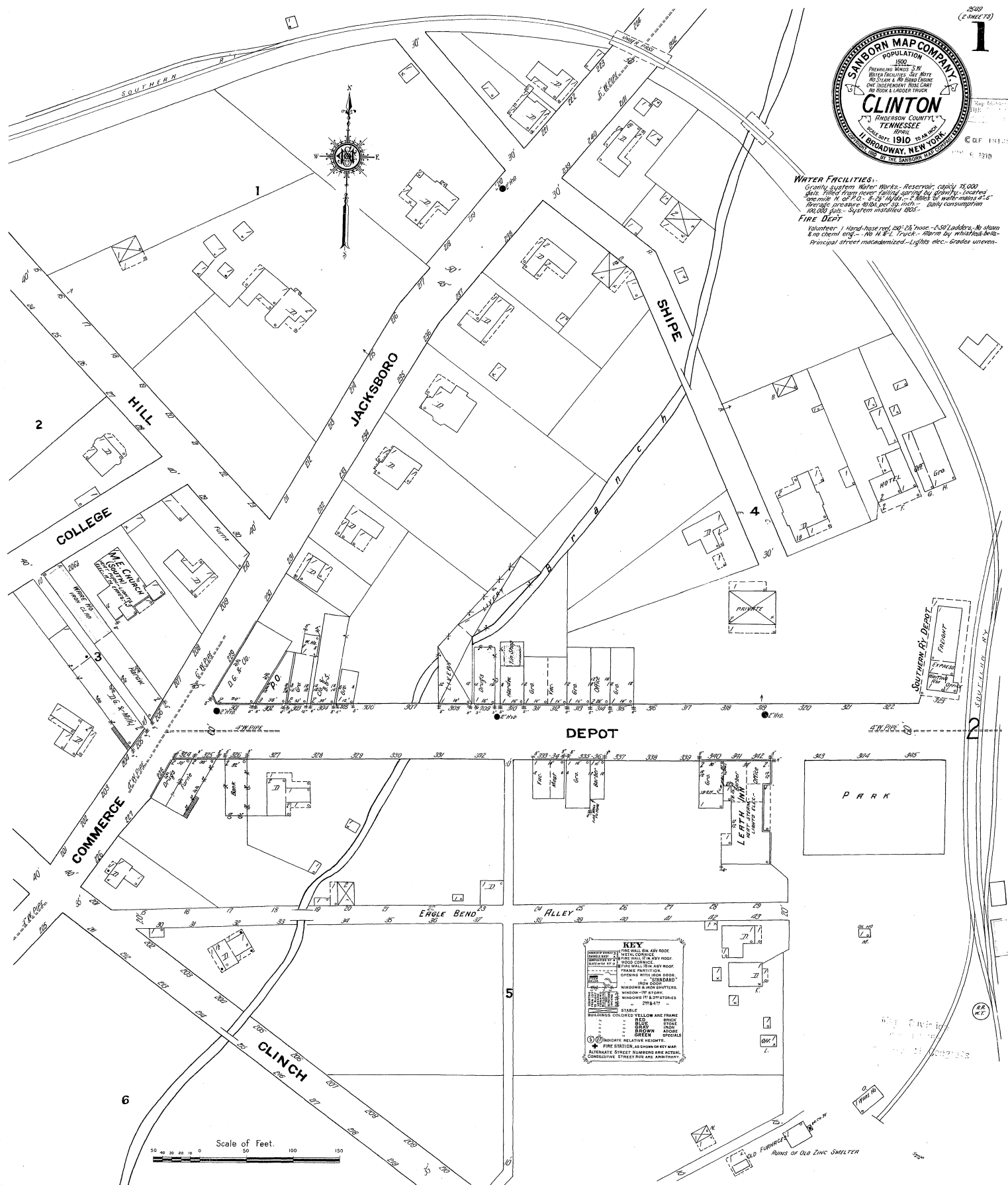
Attachments: Sanborn Map
Property Maps 074G and 074J

cc: David Randolph – DOR Central Office
DOR/KFO Anderson Co. General File



WATER FACILITIES:
Gravelly system Water Works - Reservoir, capacity 15,000 gals. Filled from never failing spring by gravity. Located about 1/2 mi. N. of P.O. - 22" dia. - 12' high water main 4.5" - liberate pressure 40 lbs. per sq. inch - daily consumption 100,000 gals. - System installed 1905.

FIRE DEPT
Volunteer 1 Hand-hose reel, 200' 2 1/2" hose - 2-50' Ladders - No steam - No chem. eng. - No H & L Truck - Alarm by whistles & bells.
Principal street macadamized - Lights elec. - Grades uneven.





100 0 100 200
Feet
Scale 1" = 100'

Parcel Boundary

- PARCEL HOOK
- INTERIOR TRACT LINE
- DISTRICT LINE
- PARCEL LINE
- CO. LINE
- CORP. LIMITS
- PARCEL & CONTROL MAP No.
- CEMETERY
- CHURCH
- SCHOOL
- STATE LINE

Planimetric Map

- ROAD ROW
- RAILROAD ROW
- STREAM
- POND
- TREE/VEGETATIVE COVER
- STREET/ROAD CENTERLINE
- DRIVE
- RIDGES



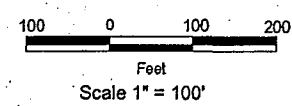
074A	074B	074C
074H	074J	074F
074I	074K	

ANDERSON COUNTY, TN

SCALE: 1" = 100'
PHOTO DATE February 2000
COMPILED June 2001
LAST REVISION June 2006

DISTRICT:
TN STATE PLANE (4100)
NAD 83 (90) NAVD (88)
CITY OF: CLINTON

MAP NO.
074G



Parcel Boundary

- PARCEL HOOK
- INTERIOR TRACT LINE
- DISTRICT LINE
- PARCEL LINE
- CO. LINE
- CORP. LIMITS
- PARCEL & CONTROL MAP No.
- CEMETERY
- CHURCH
- SCHOOL
- STATE LINE

Planimetric Map

- ROAD ROW
- RAILROAD ROW
- STREAM
- POND
- TREE/VEGETATIVE COVER
- STREET/ROAD CENTERLINE
- DRIVE
- RIDGES



074H	074G	074F
074I	074J	074K
074P	074O	074N

ANDERSON COUNTY, TN			MAP NO. 074J
SCALE: 1" = 100'		DISTRICT:	
PHOTO DATE February 2000		TN STATE PLANE (4100)	
COMPILED June 2001		NAD 83 (90) NAVD (88)	
LAST REVISION June 2006		CITY OF: CLINTON	

DISCLAIMER: THIS MAP IS FOR PROPERTY TAX ASSESSMENT PURPOSES ONLY. IT WAS CONSTRUCTED FROM PROPERTY TAX INFORMATION RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS, AND IS NOT CONCLUSIVE AS TO LOCATION OF PROPERTY OR LEGAL OWNERSHIP.

TDEC DIVISION OF REMEDIATION
KNOXVILLE
CLINTON SMELTER / MAGNET MILLS
CLINTON, ANDERSON COUNTY, TENNESSEE 37716

TRIP REPORT

DATE OF VISIT: April 7, 2008

OWNER/FACILITY: Clinch River Properties / smelter used by the Eades, Mixer, and Heald Zinc Company, and the Magnet Knitting Mill

DOR SITE Number: 01-500

TYPE FACILITIES: inactive lead/zinc ore smelting
hosiery mill 1906-1967, unknown 1967-present

ADDRESS: Cullom Street, Clinton Quadrangle (137-SW)

PURPOSE OF VISIT: Limited investigation of potential contamination from past manufacturing, spills, storage piles

WEATHER CONDITIONS: sunny, warm

SAMPLES COLLECTED: no PHOTOS TAKEN: yes

COMMENTS: A previous trip report was dated April 4, 2008.

Magnet Mills, Inc. of Clinton, Tennessee, opened its doors in 1906 as Magnet Knitting Mills. In 1929, the Mill was incorporated as Magnet Mills, Inc., a locally owned and operated hosiery mill. In March 1967, the mill was closed down permanently.

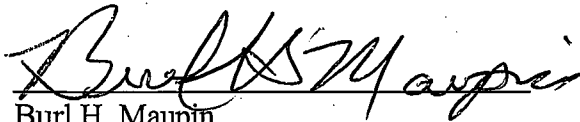
Chris Andel and Burl Maupin entered the site at the southern end of the property, only one block from the Anderson County Courthouse, at an unrestricted roadway entering the property from the CVS Pharmacy's parking lot. Industrial equipment was observed to be scattered about the ground. Unempty drums and containers with unknown contents, transformers, batteries, tanks, electric and gasoline motors, fluorescent tubes, cars, and unknown materials were observed. Six warehouse-type buildings built from 1905-1926 are at the site. Base area of all the buildings on the property covered approximately 85,000 square feet. Most of these buildings had multiple floors. At least one building was partially collapsed. Only limited portions of the interiors of the buildings were inspected.

Observations indicated potential concern for the presence of asbestos contaminated materials, contaminated soils, and containers of transformer oil, pesticides, volatile organics, and unknown substances. Selected photographs are attached.

TDEC DIVISION OF REMEDIATION
KNOXVILLE
CLINTON SMELTER / MAGNET MILLS
CLINTON, ANDERSON COUNTY, TENNESSEE 37716

TRIP REPORT

Further investigation is recommended.



Burl H. Maupin
April 7, 2008

Attached photographs: batteries
contaminated soil
methyl ethyl ketone
pesticide
tank and fluorescent tubes
tank
transformer oil
transformers 1
transformers 2
unknown 1
unknown 2
unknown 3
unknown 4
unknown 5
unknown and contaminated soil 1
unknown and contaminated soil 2
unknown pink liquid at transformers

cc: David Randolph – DOR Central Office
DOR/KFO Anderson Co. General File



04/07/2008



04/07/2008

METHYL ETHYL KETONE

CONTAINS 8.75 L

UN 1133
CAS #78-93-3



FOR INDUSTRIAL USE ONLY
KEEP OUT OF THE REACH OF CHILDREN



THE DYCO COMPANY, INC.
MEXICO, TEXAS 78101

04/07/2008



04/07/2008



04/07/2008



04/07/2008



TRANSFORMER OIL

04-07-2013



04/07/2008



04/07/2008



04/07/2008



04/07/2008



04/07/2008



Rockwater Rock
Midland Mid

ALBANY • CHARLOTTE • CHICAGO • INDIANAPOLIS • KANSAS CITY • NEW YORK • OMAHA • PHOENIX • PITTSBURGH • RICHMOND • ST. LOUIS • TAMPA • WASHINGTON • WICHITA





04/07/2008



04/07/2008

A white plastic drum with a blue rim and a blue band around the top. The drum has 'S P L' printed on its side. The top of the drum has two circular openings, one of which is covered with a white cap. The drum is sitting on a dark, textured surface, possibly gravel or dirt. A brick wall is visible in the background to the right.

S P L

04/07/2008